

EXHIBIT

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

v

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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Affidavit of Neal Simon

I am an adult and have personal knowledge and can competently testify to the following facts:

1. I am the President of the American University of Antigua College of Medicine (“AUA”).
2. AUA does not falsify student grades.
3. AUA does not commit fraud upon its students.
4. AUA does not disregard its students’ civil rights.
5. AUA does not conspire against its students.

6. AUA has at all relevant times had USMLE pass rate higher than 22.9%.
7. AUA did not contrive false evidence in the disciplinary hearings against Steven Woodward.
8. AUA professors do not teach students wrong information and instead provide a first-rate medical education.
9. AUA has not committed any criminal activities.
10. AUA has suffered damages stemming from the Defendant's publication of his website www.aua-med.com.

Neil Simon
President, American University of Antigua
College of Medicine.

Subscribed and sworn to before me this
____ day of _____, 2011.

Notary Public
My commission expires: